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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

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53RD STREET, LLC,

Plaintiff,

-against-

U.S. BANK NATIONAL ASSOCIATION,

Defendant.

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Docket No.:
1:18-cv-04203-JBW-VMS

**DECLARATION OF DANIELLE P. LIGHT, ESQ. REGARDING ATTORNEYS FEES
AND COSTS**

1. I am an attorney with Hasbani & Light, P.C., attorneys for Plaintiff, 53rd Street, LLC ("Plaintiff"). I make this declaration based on my personal knowledge in support of Plaintiff's Motion for Attorneys' Fees and Costs pursuant to FRCP Rule 54(d) in the above captioned action. I know the facts to which I testify in this Declaration to be true based on my own personal knowledge and a review of documents kept by Plaintiff in the ordinary course of its business.

2. This law firm was hired by 53rd Street, LLC after U.S. Bank National Association ("Defendant") filed a frivolous motion to discontinue in Kings County Supreme Court for the State of New York.

3. After the foreclosure action commenced by Defendant's predecessor-in-interest was dismissed, the undersigned reviewed the matter to determine whether a viable cause of action

pursuant to RPAPL section 1501(4).

4. The undersigned has continued to handle this case and has spent about 120 hours litigating this action from January 2018 until June 2020, or two and a half years. We believe our rates are actually under market and that every court both in this district and beyond would find our rates reasonable.

5. The total amount billed to Plaintiff by our firm has been about \$25,000.00. We can provide invoices with detailed breakdown of the time spent on this file and expenses incurred should the Court so require. However, in the interest of keeping our rates off of ECF so as not to become public information, we are not filing them at this time.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Dated: New York, New York
June 8, 2020

/s/Danielle P. Light
Danielle P. Light, Esq.